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*Counsel for Plaintiff Sherrie Russell-Brown*

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

-----X	
SHERRIE RUSSELL-BROWN,	:
	:
Plaintiff,	:
	:
v.	:
	:
THE UNIVERSITY OF FLORIDA,	:
BOARD OF TRUSTEES, THE	:
UNIVERSITY OF FLORIDA,	:
LEVIN COLLEGE OF LAW,	:
ROBERT H. JERRY, II, in his	:
individual and official capacities as	:
Dean of the University of Florida,	:
Levin College of Law, THE	:
UNIVERSITY OF OXFORD and	:
OXFORD UNIVERSITY	:
DEVELOPMENT (NORTH AMERICA),	:
INC.,	:
	:
Defendants.	:
	:
-----X	

Civil Action No. 2:10-cv-04017-SDW-MCA

**NOTICE OF MOTION  
TO AMEND COMPLAINT**

To: Zoë Eva Jasper, Esq.  
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*Attorneys for Defendants the University of Florida, Board of Trustees, the University of Florida, Levin College of Law and Robert H. Jerry, II*

**PLEASE TAKE NOTICE** that the undersigned attorneys for Plaintiff Sherrie Russell-Brown will move before the Honorable Susan D. Wigenton, United States District Court Judge, District of New Jersey, at the Martin Luther King, Jr. Federal Building & Courthouse, Room 5060, 50 Walnut Street, Newark, New Jersey 07102 on January 3, 2011 at 9:00 a.m., or on a date to be assigned by the Court, for an Order, pursuant to Fed. R. Civ. P. 15, allowing Plaintiff's Amended Complaint (Docket Entry No. 7) to be amended to name ALM Media, LLC, William L. Pollak and Karen Sloan, as Defendants, to include the specific factual allegations related to those parties and to provide additional jurisdictional facts.

**PLEASE TAKE FURTHER NOTICE** that counsel will rely on the annexed Certification, Exhibit, and any Oral Argument the Court requires.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Respectfully submitted,

STEVENS, HINDS & WHITE, PC

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Dated: New York, New York  
December 9, 2010